

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FARAH JEAN FRANCOIS,

Case No.: 1:22-cv-4447-JSR

Plaintiff,

-against-

SPARTAN AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI,
STAVROS ORSARIS,
YESSICA VALLEJO, and
DAVID PEREZ,

Defendants.

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SUPPLEMENTAL CERTIFICATION OF ANDREW M. MILZ

I, ANDREW M. MILZ, certify the following to be true and correct:

I am an adult individual and a member in good standing of the bars of the Commonwealth of Pennsylvania and State of New Jersey. I have been admitted *pro hac vice* counsel for the Plaintiff Farah Jean Francois in the above-captioned action. This Supplemental Certification is submitted in support of Plaintiff's Motion for Attorney Fees and Costs.

1. My firm Flitter Milz, PC and I were retained by Ms. Francois on a completely contingent basis. To date, we have not been paid by Ms. Francois, Defendants, or anyone else for our services.

2. My firm and I have incurred a lodestar of \$2,915.50 since I made my last Certification. This reflects 4.9 hours at my customary 2024 hourly rate of \$595.00. A printout from PC Law, our dedicated time management software, reflecting our lodestar is attached hereto as Exhibit "A."

3. Since my last Certification in this case, my 2024 hourly rate was approved by U.S. District Judge Christine P. O'Hearn in the New Jersey Consumer Fraud Act case *Warner v.*

Vision Solar, et al, No. 22-CV-05307-CPO-SAK (D.N.J. Feb. 26, 2025) (ECF 139, Order granting attorney fees + 15% contingency multiplier) where fees were awarded over the Defendant's contest. Also, my current hourly rate of \$635.00 for 2025 was submitted to and utilized by U.S. District Judge Juan R. Sánchez in the approval of the class action settlement in *Nelson v. Bank of America, N.A.*, U.S.D.C. E.D. Pa. No. 23-cv-00255-JS (Final Approval Order dated Feb. 18, 2025).

4. Pursuant to 28 U.S. C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Date: 3/10/25

/s/ Andrew M. Milz
ANDREW M. MILZ

March 10, 2025

Farah Francois
 145 W. 111 Street
 Apt. 8
 New York, NY 10026

Attention:

File #: 8145.001
 Inv #: Sample

RE: Francois v. Victory Mitsubishi

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-24-25	Receive and brief review of oppo to fee application	0.60	357.00	AMM
Feb-25-25	Conference CLF re Def's oppo and our reply strategy	0.30	178.50	AMM
	Review Response to fee petition, send AK detailed notes re same for Reply	2.40	1,428.00	AMM
Mar-10-25	Edits to draft of reply ISO fee petition; emails and phone calls AK re same	1.60	952.00	AMM
	Totals	4.90	\$2,915.50	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
Andrew M. Milz	4.90	\$595.00	\$2,915.50

Total Fees & Disbursements	\$2,915.50
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Previous Balance	\$0.00
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Previous Payments	\$0.00
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Balance Due Now	\$2,915.50
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AMOUNT QUOTED:	\$0.00
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EXHIBIT "A"